

Via ECF

May 20, 2024

Hon. Lorna G. Schofield
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Re: *The Travelers Indem. Co., et al. v. Northrop Grumman Corp., et al.*,
 Case No. 16-civ-8778-LGS [rel. 1:12-cv-03040-KBF]**

Dear Judge Schofield:

Pursuant to the Court's October 12, 2022 Order (ECF 469) ("Stay Order"), we write on behalf of The Travelers Indemnity Company and The Travelers Indemnity Company of Connecticut ("Travelers"), Century Indemnity Company ("Century"), and Northrop Grumman Corporation and Northrop Grumman Systems Corporation ("NG") (collectively, "the Parties"), to provide an update regarding the status of the underlying *Romano* lawsuit. This is the thirteenth status letter in response to the Stay Order.

Consistent with the Parties' statements in their November 25, 2022 letter (ECF 472), the below is NG's status summary of the *Romano* lawsuit:

1. There have been no developments in the *Romano* litigation since the parties' prior status letter, submitted on April 5, 2024 (ECF 488). As noted in the April 5, 2024 letter, until the mediation concludes, we expect few, if any, developments in the *Romano* litigation.
2. As noted in the July 10, 2023 status letter (ECF 480), the parties completed briefing the *Romano* plaintiffs' class certification motion and the parties' *Daubert* motions related to class certification experts. The completed briefing papers were filed with the court on June 7, 2023.
3. As noted in the February 20, 2024 status letter (ECF 487), in January 2024 the parties agreed to enter into mediation. In light of the anticipated mediation, the court removed the pending motions from the docket while mediation proceeds, stated it would promptly rule on the pending motions should mediation not succeed, and directed the parties to file a letter to restore the pending motions for rulings if mediation is unsuccessful. The court also scheduled a status conference for May 24, 2024.
4. As previously noted, the *Romano* court did not establish any deadlines for any proceedings after the completion of class certification briefing. Thus, there are no existing case deadlines at this time.

In accordance with the Stay Order, the Parties will file the next status letter regarding the *Romano* litigation on or before July 5, 2024.

Respectfully submitted,

SIMPSON THACHER & BARTLETT LLP

By: Lynn K. Neuner

Lynn K. Neuner
Summer Craig
425 Lexington Avenue
New York, New York 10017-3954
Tel.: (212) 455-2000
Fax: (212) 455-2502
lneuner@stblaw.com
scraig@stblaw.com

*Attorneys for Plaintiffs The Travelers Indemnity
Company and The Travelers Indemnity
Company of Connecticut*

WHITE & WILLIAMS LLP

By: Shane R. Heskin

Shane R. Heskin
Adam M. Berardi
1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103-7395
Tel: (215) 864-6329
Fax: (215) 399-9603
heskins@whiteandwilliams.com
berardia@whiteandwilliams.com

*Attorneys for Nominal Defendant Century
Indemnity Company, eventual successor in
interest to Insurance Company of North
America*

COVINGTON & BURLING LLP

By: Georgia Kazakis

Georgia Kazakis
Daniel L. Russell Jr.
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Tel: (202) 662-6000
gkazakis@cov.com
drussell@cov.com

*Attorneys for Defendants Northrop Grumman
Corporation and Northrop Grumman Systems
Corporation*